

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**  
**CAMPBELL FAMILY ENTERPRISES, INC.** **CASE NO. 24-10364-SDM**

**DEBTOR(S)** **CHAPTER 11**

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**UNITED STATES TRUSTEE'S OBJECTION TO DEBTORS'  
PLAN OF REORGANIZATION  
(DKT. #67)**

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COMES NOW David W. Asbach, Acting United States Trustee for Region 5 ("UST"), by and through undersigned counsel, and files this Objection to Debtor's Plan of Reorganization (DKT. #67), and in support thereof respectfully submits the following:

1. On May 5, 2025, Debtor filed its Plan of Reorganization (DKT. #67). The confirmation hearing is set for June 24, 2025.
2. UST requests that any order confirming the plan should require the Debtor file a Notice of Effective Date.
3. The UST also requests if the plan is consensual, the Debtor shall file a Notice of Substantial Consummation per §1183(c)(2).
4. The UST seeks clarification on the following issues:
  - a. The plan should include how the sub-chapter V trustee will be paid if the plan is consensual or non-consensual. The plan needs to provide a date in which the sub-v trustee must have his fee app filed.
  - b. The plan lists a 2020 Volvo VNR truck with a value of \$50,000.00 listed under the Class 4 Creditors and it lists a 2020 Volvo VNR truck valued at \$50,000.00

listed under the Class 6 creditors. The UST requests more information to determine if this is the same vehicle.

- c. Class 9 Creditors – General Unsecured Creditors. The UST seeks clarification as to the amount of projected disposable income amount each year and if the unsecured creditors will be paid pro rata.
5. Any Order needs to address the role of the sub-chapter V trustee. If consensual, the sub-v trustee is terminated upon filing the substantial confirmation pursuant to §1183(c)(1). If the plan is confirmed as non-consensual, then the UST requests that the order confirming the plan indicate that the Sub Chapter V Trustee remain in place for the life of the plan per §1183.
6. The UST reserves the right to provide additional grounds for denial of confirmation of the Plan at the hearing on this matter.

WHEREFORE, PREMISES CONSIDERED, the United States Trustee prays that the Court deny the Debtors' Plan of Reorganization. The United States Trustee also prays for all general relief to which it may be entitled in these premises.

RESPECTFULLY SUBMITTED, this the 9th day of June 2025.

DAVID W. ASBACH  
Acting United States Trustee  
Region 5, Districts of  
Louisiana and Mississippi

By: /s/Steven Usry  
STEVEN USRY

STEVEN USRY (MSB #100922)  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading has been served on the below-named individual(s) this day via first class U.S. Mail at the address listed below or electronically served via the electronic mail address on file with the Court's CM/ECF system:

Thomas C. Rollins  
*Attorney for Debtor*

DATED, this the 9th day of June, 2025.

By: /s/Steven Usry  
STEVEN USRY